

# **EXHIBIT K**

**In the Matter of:**

**Delton Goodrum**

**v.**

**City of Alexandria**

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**Michele McCarty**

November 25, 2024

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**Court Reporting  
Videography  
Videoconferencing**

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Michele McCarty

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11/25/2024

1 MR. ERLICH: Yes, absolutely.

2 BY MR. CALES:

3 Q So if we accidentally get into  
4 something, I know they'll speak up; you know,  
5 I'll try to avoid it, but when I ask questions  
6 that are close to the issue, use that as a  
7 guiding principle; okay?

8 A Okay.

9 Q All right. Now, what does your journal  
10 have about Delton Goodrum in it?

11 A Just some of the struggles that he  
12 experienced being removed from my bureau, or the  
13 promotional process, and the struggle that he had  
14 with that.

15 Q When you say the removal from the  
16 bureau, are you talking about his transfer to the  
17 traffic division?

18 A Yes.

19 Q What do you know about that?

20 A Well, he was working for me at the time,  
21 and he was doing, in my estimation, an  
22 outstanding job in his job duties. I was not

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1 given forewarning that that action was going to  
2 take place. Lt. Goodrum had no disciplinary  
3 actions through me. His performance evaluation  
4 that I completed for him was stellar. So I had  
5 no clear understanding, nor was I given what I  
6 would consider a reasonable explanation, as to  
7 why he was being moved.

8 Q Okay. Were you given any explanation?

9 A Yes.

10 Q What explanation were you given?

11 A That the chief -- Chief Hayes at that  
12 time was upset about a memo that he felt Lt.  
13 Goodrum was sloppy on.

14 Q Did you ever see the memo?

15 A Yes.

16 Q And do you agree with the chief's  
17 assessment?

18 A I do not.

19 Q Why not?

20 A Because it was a standard memo where you  
21 just fill in the blanks, and it referenced the  
22 testing process to become a police officer. So

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1 each month, or after each test, you just fill in  
2 the blanks -- the numbers, the demographics, the  
3 gender, and change the date on it. Lt. Goodrum  
4 didn't change the date -- or some wording; it was  
5 something that was not changed from the previous  
6 test. And, to me, Chief Hayes was very upset  
7 about that.

8 Q When you say, He was very upset, do you  
9 mean he was disproportionately upset?

10 A I believe that removing someone from  
11 their position because of that is  
12 disproportionately upset.

13 Q Okay. Are you aware of any  
14 communications Chief Hayes may or may not have  
15 had with Lt. Goodrum surrounding his work in the  
16 administrative bureau?

17 A I do not.

18 Q Other than what you've just described.

19 A Yes.

20 Q Were there any other events that you  
21 were aware of involving Lt. Goodrum and the Chief  
22 in your administrative division?

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16 administrative bureau?

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18 Q Other than what you've just described.

19 A Yes.

20 Q Were there any other events that you  
21 were aware of involving Lt. Goodrum and the Chief  
22 in your administrative division?

1 A That I witnessed personally?

2 Q Yes, ma'am.

3 A No, not personally.

4 Q Okay. Let's take the personally out of  
5 it, and tell me about anything you may have heard  
6 about, with respect to Lt. Goodrum and Chief  
7 Hayes while he was in the administrative bureau.

8 A I was told that Chief Hayes mentioned to  
9 Lt. Goodrum that he should be very careful of who  
10 he's seen walking down the hallway with, that it  
11 could impact his future chances.

12 Q What did you understand that to mean?

13 A I took that to mean those -- that Chief  
14 Hayes did not like -- he was wanting Delton to  
15 stay away from them.

16 Q So the head of the organization gave  
17 advice to a subordinate who had hopes to advance  
18 within the organization, advice to stay away from  
19 people who the head of the organization did not  
20 like?

21 A Correct.

22 Q What's the problem with that?